

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
v.)	CRIMINAL NO: 2:01cr
)	
TRAVIS BRODERICK BOYKIN,)	18 U.S.C. § 371
a/k/a "Short")	Conspiracy
)	(Count One)
and)	
)	18 U.S.C. §§ 287 and 2
JAMADA AKII JOHNSON,)	False Claims
a/k/a "Jay Rock")	(Counts Two - Nine)
a/k/a "J-Rock")	
)	18 U.S.C. §§ 641 and 2
and)	Theft of Public Money
)	(Counts Ten - Eighteen)
EDWIN LAMONT PRICE,)	
a/k/a "Smoke")	
)	
Defendants.)	

INDICTMENT

December 2001 TERM - at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

A. INTRODUCTION

At all times material to this Indictment:

1. The United States Navy is a department of the executive branch of the United States. The Navy provides administrative support to its active duty members, civilian employees, and their dependents through the Personnel Support Activity (PSA) via their various subordinate

commands known as Personnel Support Detachments. Among the support provided by PSA is compensation for travel claims for military members for relocating themselves, their dependents, and their household goods to new duty stations or to their home of record upon completion of their Naval service.

2. The Navy, through PSA, provides advance payments to Navy members for their travel expenses to a new duty station or to their home of record if they are being discharged from the service based upon a standard rate per mile. Additionally, the Navy advances payment for the shipment of the member's household goods if the member chooses to conduct a do-it-yourself (DITY) move. This method of household goods relocation allows the member to receive a cash advance based upon a predetermined maximum weight allowance. This weight allowance is determined by the members current pay grade.

3. Advance travel payments and advance DITY move payments are made to the member either in the form of an electronic funds transfer to that member's bank account or through the issuance of a United States Treasury check. If a check is issued, the member is required to pick up that check at the designated PSA office by presenting a valid identification. The balance of the allotted travel and moving expenses are paid to the member upon completion of the move.

B. THE OBJECT OF THE CONSPIRACY

Beginning in or about August of 1998 and continuing through in or about February 1999, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants, TRAVIS BRODERICK BOYKIN a/k/a "Short", JAMADA AKII JOHNSON a/k/a "Jay Rock" a/k/a "J-Rock", and EDWIN LAMONT PRICE a/k/a "Smoke", did unlawfully, knowingly and

willfully combine, conspire, confederate and agree with each other and other persons, both known and unknown to the United States, to commit the following offense against the United States, to wit: to embezzle, steal, purloin, and knowingly convert to their own use and the use of another, money of the United States and a department and agency thereof, of a value greater than \$1,000.00, in violation of Title 18, United States Code, Section 641.

C. MEANS AND METHODS OF THE CONSPIRACY

The unlawful combination, conspiracy, confederation, and agreement, was to be, and was, accomplished by defendants TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE, and others, both known and unknown, in the following means and methods:

1. It was a part of the conspiracy that TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE would recruit individuals to join the conspiracy and obtain from these individuals their names and social security numbers. These individuals were either civilian or military members but, in each case, were not service members or employees of the United States Navy entitled to payment for relocation or travel expenses.

2. It was further a part of this conspiracy that TRAVIS BRODERICK BOYKIN and JAMADA AKII JOHNSON, through their positions as active duty Navy members working at PSA located on board Naval Station Norfolk, Virginia, would generate, and cause to be generated, false Navy moving and travel documents using the names and corresponding social security numbers of the recruited co-conspirators indicating that these individuals were entitled to receive advanced payments from the Navy for moving and travel expenses, when in truth and in fact, they were not.

3. It was further a part of the conspiracy that TRAVIS BRODERICK BOYKIN and JAMADA AKII JOHNSON through their positions with PSA at Naval Station Norfolk, Virginia, would issue and cause to be issued United States Treasury checks in the names and corresponding social security numbers of recruited co-conspirators for advance moving and travel expenses purportedly authorized by the false moving and travel documents generated and caused to be generated by BOYKIN and JOHNSON.

4. It was further a part of the conspiracy that TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE would notify the recruited co-conspirators that they needed to come to PSA at Naval Station Norfolk, Virginia and pick up the fraudulent U.S. Treasury checks issued to them.

5. It was further a part of the conspiracy that TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE would escort the recruited co-conspirators to PSA at Naval Station Norfolk, Virginia where these co-conspirators would present a picture identification and then sign for and receive the fraudulent U.S. Treasury checks issued to them.

6. It was further a part of the conspiracy that TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE would escort the recruited co-conspirators to various local banks in the Norfolk, Virginia area so that the U.S. Treasury checks could be cashed or deposited.

7. It was further a part of the conspiracy that the recruited co-conspirators would either cash the U.S. Treasury checks or cause them to be deposited and then give the currency to TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE.

The stolen funds would then be split between the defendants and the co-conspirator in whose name the fraudulent U.S. Treasury check was issued.

D. OVERT ACTS

_____ In furtherance of the conspiracy, and to effect its object, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

1. In or about August 1998, TRAVIS BRODERICK BOYKIN met with Torence R. Ford at PSA on board Naval Station Norfolk, Virginia. BOYKIN told Ford that BOYKIN could arrange for Ford to receive a travel check from the Navy if Ford provided BOYKIN with Ford's social security number, which he did.

2. On or about August 31, 1998, TRAVIS BRODERICK BOYKIN telephoned Ford and told him to come to PSA and pick up a check. Ford went to PSA, met with BOYKIN, then signed for and picked up U.S. Treasury check number 8371-10809287 made out to Ford in the amount of \$3,500.00. BOYKIN then drove Ford to Chartway Federal Credit Union on board Naval Station Norfolk where Ford cashed the check and then split the proceeds with BOYKIN.

3. On or about November 9, 1998 Ford went to PSA, met with TRAVIS BRODERICK BOYKIN, then signed for and picked up U.S. Treasury check number 8371-10810338 made out to Ford in the amount of \$3,500.00. BOYKIN then drove Ford to Chartway Federal Credit Union on board Naval Station Norfolk where Ford cashed the check and then split the proceeds with BOYKIN.

4. In or about August 1998, EDWIN LAMONT PRICE introduced Steven D. Hill to TRAVIS BRODERICK BOYKIN and JAMADA AKII JOHNSON. BOYKIN and JOHNSON told Hill that they could arrange for him to receive a travel check from the Navy if Hill provided

them with his social security number, which he did.

5. On or about September 8, 1998, EDWIN LAMONT PRICE provided TRAVIS BRODERICK BOYKIN with Hill's telephone number. BOYKIN telephoned Hill and told him to come to PSA and pick up a check. Hill went to PSA, met with JAMADA AKII JOHNSON, then signed for and picked up U.S. Treasury check number 8371-10809442 made out to Hill in the amount of \$3,500.00. Hill proceeded to NationsBank on Hampton Boulevard, cashed the check, then met BOYKIN in the parking lot and split the proceeds.

6. On or about November 12, 1998, TRAVIS BRODERICK BOYKIN telephoned Hill and told him to come to PSA and pick up two additional checks. Hill went to PSA, met with JAMADA AKII JOHNSON, then signed for and picked up two U.S. Treasury checks, check number 8371-10810371 made out to Hill in the amount of \$4,000.00, and check number 8371-10810367 made out to Hill in the amount of \$522.18. BOYKIN then drove Hill to the Navy Federal Credit Union on North Hampton Boulevard where Hill cashed the checks and then split the proceeds with BOYKIN.

7. On or about September 18, 1998, TRAVIS BRODERICK BOYKIN telephoned Yulonda Yvette Caradine and told her to come to PSA and pick up a check, cash it, and return two-thirds of the money to him. Caradine went to PSA, signed for and picked up U.S. Treasury check number 8371-10809753 made out to Caradine in the amount of \$7,000.00.

8. On or about September 18, 1998, Caradine took U.S. Treasury check number 8371-10809753 to Navy Federal Credit Union, cashed it, returned to PSA and gave TRAVIS BRODERICK BOYKIN an envelope containing approximately \$4,600.00 in cash.

9. On or about September 25, 1998, JAMADA AKII JOHNSON telephoned Natasha

N. Horner and told her to come to PSA and bring an identification that contained her name and social security number so that she could pick up a check. Horner met JOHNSON at PSA and was told by him where to go to get the check. Horner signed for and picked up U.S. Treasury check number 8371-10809877 made out to Horner in the amount of \$3,500.00. JOHNSON then drove Horner to the Navy Federal Credit Union on Military Highway where she cashed the check and then gave the money to JOHNSON so that the proceeds could be split.

10. On or about November 16, 1998, JAMADA AKII JOHNSON telephoned Horner and told her to come to PSA to pick up another check. Horner then met TRAVIS BRODERICK BOYKIN outside one of the gates at Naval Station Norfolk where BOYKIN proceeded to escort Horner to PSA. Horner picked up two U.S. Treasury checks, check number 8371-10810411 made out to Horner in the amount of \$3,985.00 and check number 8371-10810412 made out to Horner in the amount of \$442.95. BOYKIN then drove Horner to the Navy Federal Credit Union on Military Highway where she deposited both checks into her account minus \$3,000.00 which she then gave to BOYKIN.

11. On or about November 1998, EDWIN LAMONT PRICE asked Horner if she knew of anyone else who may be interested in making money through this scheme. Horner provide PRICE with the name of at least one other individual and introduced PRICE to him.

12. On or about October 16, 1998, first TRAVIS BRODERICK BOYKIN and then JAMADA AKII JOHNSON called Delores Latrice Waggoner a/k/a Delores Latrice McMillan and told her to come to PSA and pick up a check. Waggoner went to PSA, met with JOHNSON, then signed for and picked up U.S. Treasury check number 8371-10810147 made out to Delores McMillan in the amount of \$3,500.00.

13. On or about October 16, 1998, Waggoner took U.S. Treasury check number 8371-10810147 to Chartway Federal Credit Union, cashed it, and proceeded to TRAVIS BRODERICK BOYKIN's residence and gave BOYKIN approximately \$2,400.00 from the proceeds of this check.

14. On or about October 21, 1998, TRAVIS BRODERICK BOYKIN called Waggoner and told her to come to PSA and pick up a second check. Waggoner went to PSA, met with JAMADA AKII JOHNSON, then signed for and picked up U.S. Treasury check number 8371-10810152 made out to Delores L. McMillan in the amount of \$522.18.

15. On or about October 21, 1998, Waggoner took U.S. Treasury check number 8371-10810152 in the amount of \$522.18 to Chartway Federal Credit Union and cashed it.

16. On or about November 30, 1998, Waggoner received by mail U.S. Treasury check number 8522-18819831 made out to Delores L. McMillan in the amount of \$1,295.52 and deposited it into her account at Chartway Federal Credit Union.

17. On or about February 1, 1999, TRAVIS BRODERICK BOYKIN drove Wilhelm Corbin Wilson to PSA on board Naval Station Norfolk, Virginia where Wilson signed for and picked up two U.S. Treasury checks both made out to Wilhelm Wilson, check number 8371-10822433 in the amount of \$435.15 and check number 8371-10822435 in the amount of \$4,100.00.

18. On or about February 1, 1999, Wilson took U.S. Treasury check numbers 8371-10822433 and 8371-10822435 to NationsBank on board Naval Station Norfolk, cashed them, and gave TRAVIS BRODERICK BOYKIN the proceeds of this checks. BOYKIN then returned approximately \$1,000.00 to Wilson.

(All in violation of Title 18, United States Code, Section 371).

COUNTS TWO THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates hereinafter set forth, in the Eastern District of Virginia, the defendants, TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE, knowingly presented and caused to be presented to the Navy's Fiscal Office of the Personnel Support Activity, Norfolk Naval Station, in Norfolk, Virginia, claims upon the United States for payment, that is, claims for expenses to be incurred by the purported service members in moving from and to various locations hereinafter specified, which the defendants knew were false, fictitious, and fraudulent in that the purported service members were not service members or employees of the United States Navy entitled to payment of any funds or monies from the United States and that they did not intend to move their household goods and belongings as claimed, which claims resulted in the approximate payments to them hereinafter specified.

2. The allegations of paragraph "1" are repeated and realleged in Counts Two through Nine, inclusive, of this Indictment, as though fully set forth therein:

COUNT	CLAIMANT'S NAME	ON OR ABOUT	MOVING FROM	MOVING TO	APPROX. PAYMENT
2	Torence R. Ford	11/9/98	Va. Beach, VA	Makah, WA	\$3,500.00
3	Steven D. Hill	9/8/98	Va. Beach, VA	San Diego, CA	\$3,500.00
4	Steven D. Hill	11/12/98	Norfolk, VA	Seattle, WA	\$4,000.00
5	Yulonda Y. Caradine	9/18/98	Norfolk, VA	San Diego, CA	\$7,000.00
6	Natasha N. Horner	9/25/98	Norfolk, VA	Redding, CA	\$3,500.00
7	Natasha N. Horner	11/13/98	Norfolk, VA	Redding, CA	\$3,985.00

COUNT	CLAIMANT'S NAME	ON OR ABOUT	MOVING FROM	MOVING TO	APPROX. PAYMENT
8	Delores L. McMillan	10/16/98	Norfolk, VA	Seattle, WA	\$3,500.00
9	Wilhelm C. Wilson	2/1/98	Va. Beach, VA	Seattle, WA	\$4,100.00

(In violation of Title 18, United States Code, Sections 287 and 2.)

COUNTS TEN THROUGH EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates hereinafter set forth, in the Eastern District of Virginia, the defendants, TRAVIS BRODERICK BOYKIN, JAMADA AKII JOHNSON, and EDWIN LAMONT PRICE, did knowingly embezzle, steal, purloin, and convert to their own use and to the use of another, monies of the United States in excess of \$1,000.00, in that they received and caused to be received United States Treasury checks in the names and amounts hereafter specified from the Navy's Fiscal Office of the Personnel Support Activity, Norfolk Naval Station, in Norfolk, Virginia, and presented and caused to be presented said United States Treasury checks to financial institutions hereafter specified for cash payment.

2. The allegations of paragraph "1" are repeated and realleged in Counts Ten through Eighteen, inclusive, of this Indictment, as though fully set forth therein:

COUNT	CLAIMANT'S NAME	ON OR ABOUT	CHECK NUMBER	AMOUNT	FINANCIAL INSTITUTION
10	Torence R. Ford	8/31/98	8371-10809287	\$3,500.00	Chartway FCU
11	Torence R. Ford	11/9/98	8371-10810338	\$3,500.00	Chartway FCU
12	Steven D. Hill	9/8/98	8371-10809442	\$3,500.00	NationsBank
13	Steven D. Hill	11/12/98	8371-10810371	\$4,000.00	Navy FCU
14	Yulonda Y. Caradine	9/18/98	8371-10809753	\$7,000.00	Navy FCU
15	Natasha N. Horner	8/25/98	8371-10809877	\$3,500.00	Navy FCU
16	Natasha N. Horner	11/16/98	8371-10810411	\$3,985.00	Navy FCU

COUNT	CLAIMANT'S NAME	ON OR ABOUT	CHECK NUMBER	AMOUNT	FINANCIAL INSTITUTION
17	Delores L. McMillan	10/15/98	8371-10810147	\$3,500.00	Chartway FCU
18	Wilhelm C. Wilson	2/1/99	8371-10822435	\$4,100.00	NationsBank

(In violation of Title 18, United States Code, Sections 641 and 2.)

A TRUE BILL:

FOREPERSON

PAUL J. MCNULTY
UNITED STATES ATTORNEY

By:

Ian K. Thornhill
Special Assistant United States Attorney
United States Attorney's Office
8000 World Trade Center
101 West Main Street
Norfolk, Virginia 23510
(757) 441-6331